

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

DIANNA DANCE, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No.: 3:16cv809
)	
NRA GROUP, LLC d/b/a)	
NATIONAL RECOVERY AGENCY,)	
)	
Defendant.)	

JOINT MOTION FOR EXTENSION OF TIME

Pursuant to Fed. R. Civ. P. 6(b)(1)(A) and Local Civil Rule 7(F)(2)(b), the parties jointly move the Court for an extension of time for the Plaintiffs to file their motion for an award of attorney's fees and costs and the Defendant to file its response. On April 4, 2017, the Plaintiffs accepted the Defendant's offer of judgment which provided for an award of damages, plus costs and reasonable attorney's fees as determined by the Court. (Doc. No. 17.) On April 6, 2017, the Court entered judgment for the plaintiffs (Doc. No. 19.) A settlement conference has been scheduled for April 25, 2017 at 9:00 a.m. before Magistrate Judge Roderick C. Young to address the sole remaining issue of the amount of attorney's fees and costs to be awarded to the plaintiffs. In the event the settlement conference is unsuccessful, the parties would request that the Court approve the following briefing schedule:

May 15, 2017: Plaintiffs will file their motion for attorney's fees and costs
June 5, 2017: Defendant will file its response
June 12, 2017: Plaintiffs will file a reply brief (if necessary)

The Plaintiffs' time to file a motion for an award of attorney's fees and costs has not yet expired. Plaintiffs' counsel has agreed to the requested extension of time and an Agreed Order is circulating for endorsement. A copy of the Agreed Order is attached hereto.

Respectfully submitted,

NRA GROUP, LLC, doing business as
NATIONAL RECOVERY AGENCY,

By Counsel

/s/ Mark R. Colombell

Mark R. Colombell, VSB No. 48183
ThompsonMcMullan, P.C.
100 Shockoe Slip, Third Floor
Richmond, Virginia 23219
Phone 804-698-6251
Fax 804-780-1813
Email: mcolombell@t-mlaw.com
Counsel for Defendant

CERTIFICATE OF SERVICE

I certify that on April 11, 2017, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record, including:

Dale W. Pittman, Esq.
The Law Office of Dale W. Pittman, P.C.
The Eliza Spotswood House
112-A West Tabb Street
Petersburg, VA 23803
Email: dale@pittmanlawoffice.com
Counsel for Plaintiffs

/s/
Mark R. Colombell, VSB No. 48183
ThompsonMcMullan, P.C.
100 Shockoe Slip, 3rd Floor
Richmond, Virginia 23219
Phone 804-698-6251
Fax 804-780-1813
Email: mcolombell@t-mlaw.com
Counsel for Defendant